

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BOYAN DING,

v.

UR M. JADDOU, Director, U.S. Citizenship and
Immigration Services, *et al.*,

Defendants.

9/26/2022

USDC SDNY	
DOCUMENT	
ELECTRONICALLY FILED	
Plaintiff,	DOC #:
DATE FILED: 9/27/2022	

No. 22 Civ. 5656 (CM)

**MOTION TO SEAL AND
REDACT**

Plaintiff may file a
redacted version of
Docket #2
with redacted
personal
dates, birth of
plaintiff, social
security numbers.
Nothing
else
may
be
redacted
from
Docket #2
should be
permanently
sealed
9/26/2022
W

COMES NOW Plaintiff, Boyan Ding, by and through undersigned counsel, and respectfully requests that this Honorable Court permanently seal, and allow Plaintiff to file the redacted version of SDNY CM/ECF **Docket Entry # 2**, "COMPLAINT IN THE NATURE OF MANDAMUS against Ur Mendoza Jaddou, Alejandro Mayorkas, Patricia A. Menges, Tracy Renaud, U.S. Citizenship and Immigration Services, U.S. Department of Homeland Security, Michael Valverde. Document filed by Boyan Ding. (Attachments: # 1 Exhibit Mandamus Exhibits). (Alexandre, Felipe) (Entered: 07/01/2022)".

Plaintiff, through counsel, respectfully requests that the Court also permanently seal the Attachments to **Docket Entry # 2**, "Attachments: # 1 Exhibit Mandamus Exhibits".

Counsel for Plaintiff inadvertently failed to file a redacted version of **Docket Entry # 2**, including attachments, pursuant to Rule 5.2(a) of the Federal Rules of Civil Procedure. Counsel for Plaintiff only recently became aware of this error and expeditiously prepared this motion. The filings include personal identifiers, such as dates of birth and social security numbers. A grant of this motion would allow Plaintiff's counsel to file a redacted version of the Complaint and Exhibits from **Docket Entry # 2** in compliance with the rules. Plaintiff's counsel apologizes to the Court for above-mentioned oversight.

This is the first such request made by Plaintiff in the above-captioned matter. Counsel for

MEMO ENDORSED

the Defendants consents to this request.

WHEREFORE, Plaintiff, through undersigned counsel, respectfully requests that this Honorable Court grant this Motion to Seal Docket Entry #2 and allow Plaintiff to file a redacted version of the Complaint and Exhibits.

Dated: Flushing, New York
September 21, 2022

Respectfully submitted,

/s/Felipe Alexandre
Felipe Alexandre, Esq.
Alexandre Law Firm, P.C.
136-20 38th Avenue, Suite 10F
Flushing, NY 11354
Telephone: (718) 305-1660
Fascimile: (407) 370 6970